



LAX & NEVILLE LLP

BARRY R. LAX
BRIAN J. NEVILLESANDRA P. LAHENS
RAQUEL TERRIGNO
GABRIELLE J. PRETTO1450 BROADWAY, 35TH FLOOR
NEW YORK, NY 10018
T: 212.696.1999
F: 212.566.4531
LAXNEVILLE.COMUSDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: July 10, 2014

July 10, 2014

VIA E-MAIL (Failla NYSCDhambers@nysd.uscourts.gov)The Honorable Katherine Polk Failla
U.S. District Court For The Southern District Of New York
40 Foley Square, Courtroom 618
New York, New York 10007**Re: Goldin et al. vs. State Street Bank & Trust Co. - Index No. 13-cv-05711 (KPF)**

Your Honor:

This firm represents Plaintiffs Steven Goldin, as Beneficiary of Bernice Goldin's IRA, as Co-Executor of Bernice Goldin's estate on behalf of Bernice Goldin's IRA, and as Co-Trustee of the Paul Goldin Marital Trust B, and Rochelle Goldin as Beneficiary of Bernice Goldin's IRA, as Co-Executor of Bernice Goldin's estate on behalf of Bernice Goldin's IRA, and as Co-Trustee of the Paul Goldin Marital Trust B (collectively "Goldins") in the above referenced matter. Please be advised that the parties have mutually agreed to an extension of time for the Goldins to file their First Amended Complaint. The original due date for the Goldins to file their First Amended Complaint is today, July 10, 2014, and no previous requests for extension of time have been made. The parties mutually agree that the deadline for the Goldins to file their First Amended Complaint be extended to July 21, 2014, and the time for Defendant State Street Bank & Trust Co. ("Defendant") to respond either with an answer or with a pre-motion letter is extended to August 20, 2014.

This request was mutually agreed upon by the parties based on the schedules and competing demands of the parties' counsel and counsel's view that, without conceding that the proceedings are relevant, we believe it would be most efficient to allow the criminal trial against James Tagliaferri by the United States Attorney For The Southern District Of New York in the matter bearing the caption *United States of America vs. James Tagliaferri*, Index No. 13-cr-115, to conclude next week before the First Amended Complaint is filed.

Respectfully submitted,

/s/ Barry R. Lax
Barry R. Lax, Esq.

SO ORDERED.

cc: Andrea J. Robinson, Wilmer Hale
Application GRANTED.Dated: July 10, 2014
New York, New YorkHON. KATHERINE POLK FAILLA
UNITED STATES DISTRICT JUDGE